



## Memo Endorsed

January 8, 2020

### VIA ECF

Hon. Judge Ona T. Wang  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Christine Hazel S. Cruz v. G-Star Inc., et. al. (1:17-cv-07685)

Hon. Judge Wang:

As counsel, respectively, for Plaintiff Christine Hazel S. Cruz ("Plaintiff") and Defendants G-Star Inc. and G-Star USA LLC (collectively, "G-Star"), we jointly submit this letter. We write pursuant to I.E of Your Honor's Individual Practices to respectfully request an adjournment of the January 30, 2020 status conference in this matter, and to request an extension of the deadlines for the submissions of charts and filing of a joint agenda in connection therewith.

Pursuant to the Court's December 20, 2019 Order [Dckt. No. 141], the Court scheduled a status conference in this matter on January 30, 2020 at 3:30 p.m. and directed that, on or before January 23, 2020: (i) a joint agenda be filed, (ii) Plaintiff "submit a chart identifying the eight custodians referenced in her letter, how she believes they are relevant, and what documents have been produced from the accounts so far", and (iii) Plaintiff "submit a separate chart identifying all other custodians referenced in her letter on page 2 and footnote 1, why they are relevant, whether the account was deleted after a litigation hold had been put in place, and why she believes the accounts should not have been deleted."

Both parties respectfully request that the status conference be adjourned to February 14<sup>th</sup>, 2020, or in the alternative to February 21<sup>st</sup>, 2020. In addition, the parties jointly request that the deadlines for the filing of the joint agenda and Plaintiff's submission of both charts be extended to seven days prior to the re-scheduled conference. The reason for this request is that, during the week of the conference, Defendants' counsel likely will need to travel to Denver for the expected birth of her grandchild. In the meantime, Defendants have to draft a reply to two briefs to the Second Circuit. In addition, the deadlines for the submission of the charts and the filing of the joint agenda are currently scheduled on the same date as the deadline for Plaintiff's submission of her reply to her supplemental motion for sanctions against Defendants, and Plaintiff's counsel has an arbitration hearing in another matter during that same week. In light of the foregoing scheduling conflicts, the parties are jointly, respectfully requesting a short adjournment of the upcoming conference and a corresponding extension of the deadlines for the submissions of charts and filing of the joint agenda due in connection therewith. This is the parties' first request for both the adjournment and the extensions, and counsel for both parties consent to the same.

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We appreciate the Court's time and consideration, and should Your Honor need any further information, we are available at the Court's convenience.

Respectfully submitted,

ADELMAN MATZ P.C.



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*Attorney for Defendants  
G-Star Inc. and G-Star USA LLC*

**Application Granted.**

The conference scheduled for January 30, 2020 is rescheduled to **February 25, 2020 at 2:30 p.m.** The charts and agenda are due by **February 18, 2020.**

**SO ORDERED.**



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Ona T. Wang  
U.S. Magistrate Judge

1/9/2020